IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 1:20-cr-00143

v.

Honorable T.S. Ellis, III

ZACKARY ELLIS SANDERS,

Closed case

Defendant.

MOTION TO WITHDRAW APPEARANCE OF COUNSEL

Undersigned defense counsel respectfully moves this Honorable Court for the entry of an Order granting Jade Chong-Smith leave to withdraw her *pro hac* vice appearance as an attorney for Mr. Zackary Ellis Sanders. Pursuant to Local Criminal Rule 57.4, Jade Chong-Smith previously entered an appearance, *pro hac vice*, as an attorney for Mr. Sanders on July 9, 2020. Ms. Chong-Smith will no longer be employed at KaiserDillon PLLC as of May 20, 2022, and will no longer represent Mr. Sanders. I therefore move to withdraw her appearance as counsel in this matter. Undersigned counsel, along with co-counsel, will continue to represent Mr. Sanders.

In light of the above, undersigned counsel respectfully moves the Court for the entry of an Order, a proposed copy of which is filed contemporaneously with this Motion, permitting Ms. Chong-Smith to withdraw her appearance of counsel for Mr. Sanders.

Respectfully submitted,

/<u>s</u>/

Jonathan Jeffress (#42884)

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Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May 2022, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

<u>/s/ Jonathan Jeffress</u> Jonathan Jeffress